

Attorney or Party Name, Address, Telephone and FAX Nos., State Bar No. & Email Address		FOR COURT USE ONLY
Andy C. Warshaw 1200 Main St., Suite C Irvine, CA 92614 714-442-3319 Fax: 714-361-5380 263880 CA awarshaw@bwlawcenter.com		
<input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: [proposed] debtor in possession		
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA		
In re: <p style="text-align: center;">2nd Chance Investment Group, LLC</p>	CASE NO.: 8:22-bk-12142-SC CHAPTER: 11	
	NOTICE OF MOTION AND MOTION IN INDIVIDUAL CHAPTER 11 CASE FOR ORDER SETTING BAR DATE TO FILE PROOFS OF CLAIM [FRBP 3003(c)(3)]	
	This motion is being made under <u>ONLY ONE</u> of the following notice procedures: <input checked="" type="checkbox"/> No hearing: LBR 9013-1(q); or <input type="checkbox"/> Hearing set on regular notice: LBR 9013-1(d) DATE: TIME: COURTROOM: ADDRESS:	
Debtor(s).		

- PLEASE TAKE NOTICE THAT** the Debtor moves this court for an order setting a bar date to file proofs of claim.
- NOTICE PROVISIONS AND DEADLINES FOR FILING AND SERVING A WRITTEN RESPONSE:** Your rights might be affected by this Motion. You may want to consult an attorney. Refer to the box checked below for the deadline to file and serve a written response. If you fail to timely file and serve a written response, the court may treat such failure as a waiver of your right to oppose the Motion and may grant the requested relief. You must serve a copy of your opposition upon the committee, if any, the Debtor, the Debtor's attorney, the United States trustee and on the judge pursuant to LBR 5005-2(d) and the Court Manual.

- a. ☒ **No Hearing Scheduled; Notice Provided Under LBR 9013-1(q):** This Motion is filed by Debtor pursuant to LBR 9013-1(q), which provides for granting of motions without a hearing. The full Motion is attached, including the legal and factual grounds upon which the Motion is made.
- b. ☐ **Hearing Set on Regular Notice; Notice Provided Under LBR 9013-1(d):** This Motion is set for hearing on regular notice pursuant to LBR 9013-1(d). The full Motion and supporting documentation are attached, including the legal and factual grounds upon which the Motion is made. If you wish to oppose this Motion, you must file a written response with the court and serve it as stated above **no later than 14 days prior to the hearing**. Your response must comply with LBR 9013-1(f). The undersigned hereby verifies that the hearing date and time selected were available for this type of Motion according to the judge's self-calendaring procedures [LBR 9013-1(b)].
- c. ☐ **Other (specify):**

Date: January 3, 2023

By: /s/ Andy C. Warshaw
Signature of Debtor, or attorney for Debtor

Name: Andy C. Warshaw
Printed name of Debtor, or attorney for Debtor

MOTION FOR ORDER SETTING BAR DATE TO FILE PROOFS OF CLAIM

In order for the Debtor to prepare a plan of reorganization, the Debtor must ascertain which creditors intend to assert claims against the estate, and the validity of those claims.

The Debtor requests the court to order, pursuant to FRBP 3003(c)(3):

1. The deadline (Bar Date) for creditors of the Debtor to file proofs of claim is March 31, 2023.
2. On or before February 3, 2023, the Debtor must serve written notice of the Bar Date, including the language required by LBR 3001-1, to all creditors and the United States trustee.

Date: January 3, 2023

By: /s/ Andy C. Warshaw
Signature of attorney for Debtor, if any

Name: Andy C. Warshaw
Printed name of attorney for Debtor, if any

Exhibit A

A proposed form of notice of Bar Date (using mandatory LBR form F 3003-1.NOTICE.BARDATE) is attached to this motion as an exhibit.

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>Andy C. Warshaw 1200 Main St., Suite C Irvine, CA 92614 714-442-3319 Fax: 714-361-5380 California State Bar Number: 263880 CA awarshaw@bwlawcenter.com</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: [proposed] debtor in possession</p>	<p>FOR COURT USE ONLY</p>
<p style="text-align: center;">UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA</p>	
<p>In re: 2nd Chance Investment Group, LLC</p> <p style="text-align: right;">Debtor(s).</p>	<p>CASE NO.: 8:22-bk-12142-SC CHAPTER <u>11</u></p> <p style="text-align: center;">NOTICE OF HEARING DATE TO FILE PROOFS OF CLAIM IN AN INDIVIDUAL CHAPTER 11 CASE [LBR 3001-1]</p>

The court set a deadline of March 31, 2023 (Bar Date) for creditors in the above-referenced matter to file proofs of claim against the Debtor's estate. ON OR BEFORE THE BAR DATE, PROOFS OF CLAIMS MUST BE FILED WITH THE COURT CLERK AT:

- | | |
|--|---|
| <input type="checkbox"/> 255 East Temple Street, Los Angeles, CA 90012 | <input checked="" type="checkbox"/> 411 West Fourth Street, Santa Ana, CA 92701 |
| <input type="checkbox"/> 21041 Burbank Boulevard, Woodland Hills, CA 91367 | <input type="checkbox"/> 1415 State Street, Santa Barbara, CA 93101 |
| <input type="checkbox"/> 3420 Twelfth Street, Riverside, CA 92501 | |

You may obtain a Proof of Claim form on the Bankruptcy Court's web site at <http://www.cacb.uscourts.gov>, or visit the intake area at any division of the court. Some of the exceptions to the Bar Date to file Proofs of Claim include:

(1) claims arising from rejection of executory contracts or unexpired leases, (2) claims of government units, and (3) claims arising as the result of transfer avoidance pursuant to chapter 5 of the Bankruptcy Code.

For claims arising from rejection of executory contracts or unexpired leases pursuant to 11 U.S.C. § 365, the last day to file a Proof of Claim is (a) 30 days after the date of entry of the order authorizing the rejection, or (b) the Bar Date, whichever is later.

For claims of "government units," as that term is defined in 11 U.S.C. § 101(27), Proofs of Claims are timely filed if filed: (a) before 180 days after the date of the Order for Relief in this case, or (b) the Bar Date, whichever is later. 11 U.S.C. § 502(b)(9).

For claims arising from the avoidance of a transfer under chapter 5 of the Bankruptcy Code, the last day to file a

Proof of Claim is (a) 30 days after the entry of judgement avoiding the transfer, or (b) the Bar Date, whichever is later.

If you are listed on the Debtor's Schedules of Assets and Liabilities and your claim is not scheduled as disputed, contingent, unliquidated or unknown, your claim is deemed filed in the amount set forth in the schedules. The filing of a Proof of Claim is unnecessary if you agree that the amount scheduled is correct and that the category in which your claim is scheduled (secured, unsecured, etc.) is correct. 11 U.S.C. § 1111(a).

If your claim is not listed on the schedules or is scheduled as disputed, contingent, unliquidated or unknown, or you disagree with the amount of description scheduled for your claim, you must file a Proof of Claim.

FAILURE OF A CREDITOR TO FILE TIMELY A PROOF OF CLAIM ON OR BEFORE THE DEADLINE MAY RESULT IN DISALLOWANCE OF THE CLAIM OR SUBORDINATION UNDER THE TERMS OF A PLAN OF REORGANIZATION WITHOUT FURTHER NOTICE OF HEARING. 11 U.S.C. § 502(b)(9). CREDITORS MAY WISH TO CONSULT AN ATTORNEY TO PROTECT THEIR RIGHTS.

Date: January 3, 2023

By: /s/ Andy C. Warshaw

Signature of Debtor, or attorney for Debtor

Name: Andy C. Warshaw

Print name of Debtor, or attorney for Debtor

Exhibit B

Proposed Order

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Andy C. Warshaw 1200 Main St., Suite C Irvine, CA 92614 714-442-3319 Fax: 714-361-5380 263880 CA awarshaw@bwlawcenter.com	FOR COURT USE ONLY
<input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: [proposed] debtor in possession	
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - <u>SANTA ANA</u> DIVISION	
In re: 2nd Chance Investment Group, LLC	CASE NO.: 8:22-bk-12142-SC CHAPTER: 11
	ORDER IN AN INDIVIDUAL CHAPTER 11 CASE SETTING BAR DATE TO FILE PROOFS OF CLAIM
Debtor(s).	<input checked="" type="checkbox"/> No hearing: LBR 9013-1(q) <input type="checkbox"/> Hearing information DATE: TIME: COURTROOM: ADDRESS:

The court having considered the motion, IT IS ORDER THAT:

1. The Motion is granted pursuant to FRBP 3003(c)(3).
2. The bar date for creditors of the Debtor to file proofs of claim is March 31, 2023.
3. On or before February 3, 2023, the Debtor must serve written notice of the bar date, including the language required by LBR 3001-1, on all creditors and the United States trustee. The Debtor may use LBR form F 2018-2.6.NOTICE.BARDATE.

☐ Other (*specify*):

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UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

IN RE:

2ND CHANCE INVESTMENT GROUP, LLC

CASE NO: 8:22-bk-12142-SC

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 11

On 1/3/2023, I did cause a copy of the following documents, described below,

NOTICE OF MOTION AND MOTION IN INDIVIDUAL CHAPTER 11 CASE FOR ORDER SETTING BAR DATE TO FILE
PROOFS OF CLAIM[FRBP 3003(c)(3)]

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 1/3/2023

/s/ Andy C. Warshaw

Andy C. Warshaw 263880

Attorney for Debtor

Financial Relief Law Center, APC

1200 Main St., Suite C

Irvine, CA 92614

714 442 3319

awarshaw@bwlawcenter.com

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

IN RE:
2ND CHANCE INVESTMENT GROUP, LLC

CASE NO: 8:22-bk-12142-SC

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 11

On 1/3/2023, a copy of the following documents, described below,

NOTICE OF MOTION AND MOTION IN INDIVIDUAL CHAPTER 11 CASE FOR ORDER SETTING BAR DATE TO FILE
PROOFS OF CLAIM[FRBP 3003(c)(3)]

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 1/3/2023



Jay S. Jump
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Andy C. Warshaw
Financial Relief Law Center, APC
1200 Main St., Suite C
Irvine, CA 92614

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 822-BK-12142-SC
CENTRAL DISTRICT OF CALIFORNIA
TUE JAN 3 8-3-45 PST 2023

DEBTOR

2ND CHANCE INVESTMENT GROUP LLC
600 W SANTA ANA BLVD
PMB 5045
SANTA ANA CA 92701-4558

ALLY BANK CO AIS PORTFOLIO SERVICES
LLC
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

~~EXCLUDE~~

~~(U) INTERESTED PARTY~~

~~EXCLUDE~~

~~SANTA ANA DIVISION
411 WEST FOURTH STREET SUITE 2030
SANTA ANA CA 92701 4500~~

ASB VENTURES LLC
CO SCHORR LAW
1901 AVENUE OF THE STARS SUITE 615
LOS ANGELES CA 90067-6051

AARON ZISTMAN
18518 DANCY ST
ROWLAND HEIGHTS CA 91748-4777

ALLY
PO BOX 380902
MINNEAPOLIS MN 55438-0902

~~EXCLUDE~~

~~(D) ALLY BANK CO AIS PORTFOLIO SERVICES
LLC
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118 7901~~

AMERICAN EXPRESS
PO BOX 96001
LOS ANGELES CA 90096-8000

AMERICAN EXPRESS NATIONAL BANK
CO BECKET AND LEE LLP
PO BOX 3001
MALVERN PA 19355-0701

DAVID GUZMAN
14583 MCKENDREE AVE
CHINO CA 91710-6988

DEL TORO LOAN SERVICING INC
2300 BOSWELL ROAD
SUITE 215
CHULA VISTA CA 91914-3559

FCI
8180 E KAISER BLVD
ANAHEIM CA 92808-2277

FABIAN KATHY LYNN MARTINEZ
13352 MARTY LANE
GARDEN GROVE CA 92843-2234

(P)FAY SERVICING LLC
P O BOX 814609
DALLAS TX 75381-4609

FELIPE GUTIERREZ JR
13056 SYCAMORE AVE APT B
CHINO CA 91710-6725

FRANCHISE TAX BOARD
PIT BANKRUPTCY MS A340
PO BOX 2952
SACRAMENTO CA 95812-2952

GREGORY STEVEN
37915 MARSALA DR
PALMDALE CA 93552-3966

HITEN RAM BHAKTA SAJAN BHAKTA
CO SCHORR LAW
1901 AVENNUE OF THE STARS
SUITE 615
LOS ANGELES CA 90067-6051

HOME DEPOT CREDIT SERVICES
PO BOX 9001010
LOUISVILLE KY 40290-1010

INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

JESSIE AND MICHELLE ACOSTA
13337 NELLIE AVE
CHINO CA 91710-7390

KIWI CORP
MINA BHAKTA
11353 HIGHDALE STREET
NORWALK CA 90650-5737

LAMAR ADVERTISING
449 EAST PARK CENTER CIRCLE SOUTH
SAN BERNARDINO CA 92408-2872

LOWES BUSINESS ACCTGECRB
PO BOX 530970
ATLANTA GA 30353-0970

MARGARET ADAMS
25641 BYRON S
SAN BERNARDINO CA 92404-6439

MERAH LLC
7026 EDINBORO STREET
CHINO CA 91710-6961

(P)MERCEDES BENZ FINANCIAL SERVICES
13650 HERITAGE PARKWAY
FORT WORTH TX 76177-5323

~~EXCLUDE~~

~~(D) (P)MERCEDES BENZ FINANCIAL SERVICES
13650 HERITAGE PARKWAY
FORT WORTH TX 76177-5323~~

MIDARE LLC
14583 MCKENDREE AVE
CHINO CA 91710-6988

OMAR HOUARI
2425 SAN ANTONIO CRESCENT WEST
UPLAND CA 91784-1054

PRAMIRA HOLDINGS LLC
2552 WALNUT AVE
SUITE 200
TUSTIN CA 92780-6983

PRAMIRA LLC
1422 EDINGER AVE STE 250
TUSTIN CA 92780-6299

PRECISION REALTY LLC
930 SAN PABLO AVE
SUITE B
SAN FRANCISCO CA 94141

RAYSHON FOSTER
4349 SOUTH VICTORIA
LOS ANGELES CA 90008-4903

ROSENDO QUIROZ ESTORGA
1004 PEACHWOOD CRT
RAYMOND CA 93653

SALVADOR JIMENEZ
12822 CLEMSON DRIVE
CORONA CA 92880-3369

SELECT PORTFOLIO SERVICING
PO BOX 65250
SALT LAKE CITY UT 84165-0250

SELENE FINANCE
PO BOX 422039
HOUSTON TX 77242-4239

SHAWN M SOUTHERN
1611 151ST ST
SAN LEANDRO CA 94578-1955

SMALL BUSINESS ADMINISTRATION
10737 GATEWAY WEST
300
EL PASO TX 79935-4910

STAPLES CREDIT PLAN
DEPT 51 7892022301
PHOENIX AZ 85062

STRATEN LENDING
CO SHORR LAW
1901 AVENUE OF THE STARS SUITE 615
LOS ANGELES CA 90067-6051

STREAM KIM HICKS WRAGE ALFARO
3403 TENTH ST
SUITE 700
RIVERSIDE CA 92501-3641

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ATTN ASSET DEFAULT MANAGEMENT
7525 TOPANGA CANYON BLVD
CANOGA PARK CA 91303-1214

TERESA MILLER
827 MERIDIAN AVE
SAN BERNARDINO CA 92410-1029

THAMAR PETERSON
43933 30 ST E
LANCASTER CA 93535-5872

~~EXCLUDE~~

~~UNITED STATES TRUSTEE (CA)
411 W FOURTH ST SUITE 7160
SANTA ANA CA 92701-4500~~

ZONA AZ LLC
3863 E HERMOSA VISTA DRIVE
MESA AZ 85215-1705

ZONA CA LLC
3863 E HERMOSA DRIVE
MESA AZ 85215-1705

AMANDA G BILLYARD
FINANCIAL RELIEF LAW CENTER
1200 MAIN ST SUITE C
IRVINE CA 92614-6749

ANDY C WARSHAW
FINANCIAL RELIEF LAW CENTER APC
1200 MAIN STREET
STE C
IRVINE CA 92614-6749

(U.S. Trustee)
United States Trustee (SA)
411 W Fourth St., Suite 7160
Santa Ana, CA 92701-4593
represented by:
Queenie K Ng
411 West Fourth St.
Suite 7160
Santa Ana, CA 92701

queenie.k.ng@usdoj.gov

(Interested Party)
Interested Party
represented by:
David M Goodrich
Golden Goodrich
650 Town Center Drive, Suite 600
Costa Mesa, CA 92626

dgoodrich@go2.law

(Creditor)
Ally Bank, c/o AIS Portfolio Services,
LLC
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118
represented by:
Arvind Nath Rawal
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Irving, TX 75038

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(Debtor)
2nd Chance Investment Group, LLC
600 W. Santa Ana Blvd.
PMB 5045
Santa Ana, CA 92701
Tax ID / EIN: 81-4146980
represented by:
Amanda G. Billyard
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1200 Main St. Suite C
Irvine, CA 92614

abillyard@bwlawcenter.com